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Attorneys for Plaintiff
AMERIPRIDE SERVICES INC.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

AMERIPRIDE SERVICES INC., a Delaware
corporation,

Plaintiff,

vs.

VALLEY INDUSTRIAL SERVICES, INC., a
former California corporation and TEXAS
EASTERN OVERSEAS, INC., a former
Delaware Corporation,

Defendants.

AND CONSOLIDATED ACTION AND
CROSS AND COUNTER-CLAIMS.

Case No. CIV. S-00-113 LKK/JFM

**JOINT STIPULATION AND ORDER
CONTINUING THE HEARINGS ON
DEFENDANT TEXAS EASTERN
OVERSEAS, INC.'S DAUBERT
MOTION TO EXCLUDE OPINION
TESTIMONY OF PLAINTIFF'S
EXPERT; MOTION TO RE-OPEN
DISCOVERY; AND MOTION FOR
SANCTIONS AGAINST AMERIPRIDE
SERVICES INC.**

Date: June 20, 2011
Time: 10:00 a.m.
Dept.: 4

Hon. Lawrence K. Karlton

Trial Date: January 18, 2012
Discovery Cut Off: May 1, 2011
Motion Cut Off: July 1, 2011

1 The parties to the above-entitled action, by and through their respective counsel, hereby
2 stipulate and request the Court to continue the hearings on Defendant Texas Eastern Overseas,
3 Inc.'s ("TEO") Notice of Daubert Motion to Exclude Opinion Testimony of Plaintiff's Expert (Dkt.
4 740); Notice of Motion to Re-Open Discovery (Dkt. 736); and Notice of Motion for Sanctions
5 Against AmeriPride Services Inc. (Dkt. 745) and the associated briefing schedule.

6 On May 23, 2011, TEO filed its Daubert Motion to Exclude Opinion Testimony of Plaintiff's
7 Expert; Motion to Re-Open Discovery; and Motion for Sanctions Against AmeriPride Services Inc.
8 The hearings on these motions are currently set for June 20, 2011. Counsel for AmeriPride Services
9 Inc. ("AmeriPride") are unavailable on June 20 due to pre-existing commitments: Mr. Hunsucker
10 will be out of the country, Mr. Zagon will be outside of the Continental United States and Ms.
11 Hodson will be on maternity leave.

12 Counsel for TEO has agreed to move the hearing date and the parties have agreed on a
13 briefing schedule, subject to the Court's approval.

14 Based on the foregoing, IT IS HEREBY STIPULATED by and between the parties as
15 follows:

16 The hearings on Defendant TEO's Daubert Motion to Exclude Opinion Testimony of
17 Plaintiff's Expert; Motion to Re-Open Discovery; and Motion for Sanctions Against AmeriPride
18 Services Inc. will be continued to July 18, 2011.

19 AmeriPride's oppositions to all of the motions shall be due on or before June 20, 2011.

20 TEO's reply briefs in support of all of the motions shall be due on or before July 11, 2011.

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1 Dated: May 27, 2011

HUNSUCKER GOODSTEIN & NELSON PC

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3 By: /s/ Brian L. Zagon
Philip C. Hunsucker
4 Brian L. Zagon
5 Maureen B. Hodson
Attorneys for
6 AMERIPRIDE SERVICES INC.

7 STOEL RIVES LLP
8 Lee N. Smith
Attorneys for
9 AMERIPRIDE SERVICES INC.

10 Dated: May 27, 2011


BASSI, EDLIN, HUIE & BLUM LLP

11
12 By: /s/ Fred M. Blum
13 Fred M. Blum
14 Antonia O. Garcia, Jr.
Attorneys for
15 TEXAS EASTERN OVERSEAS, INC.

16 WILSON ELSEER MOSKOWITZ, EDELMAN &
17 DICKER LLP
18 Ronald S. Bushner
Bernard Gehlhar
19 Emily M. Weissenberger
Attorneys for
20 TEXAS EASTERN OVERSEAS, INC.

21 IT IS SO ORDERED.

22
23 Dated: June 1, 2011

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26 LAWRENCE K. KARLTON
27 SENIOR JUDGE
28 UNITED STATES DISTRICT COURT